

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----	X	
BERT C. ROBERTS, JR., Plaintiff,)	Civil Action
)	
v.)	Case No. 1:04-cv-04089-DLC
)	
ASSOCIATED ELECTRIC & GAS)	
INSURANCE SERVICES LIMITED, et al,)	
Defendants)	Judge Denise L. Cote
)	
-----	X	

**MOTION FOR ADMISSION OF
SCOTT D. MICHEL PRO HAC VICE**

ELIHU INSELBUCH, an attorney duly admitted to the Bar of this Court, based upon the accompanying affidavit of Scott D. Michel, Esq., hereby moves the admission of Scott D. Michel, Esq., *pro hac vice*, as counsel to Walter Nagel, in the above-captioned case, to argue and try this action in whole or in part. Scott D. Michel is a member in good standing of the Bar of the State of New York, admitted to practice before all state courts in New York since 1993.

Dated: New York, New York
December 20, 2004

CAPLIN & DRYSDALE, CHARTERED

By: /s/ Elihu Inselbuch
Elihu Inselbuch (EI-2843)

Attorneys for Defendant on the Counterclaim
Walter Nagel
399 Park Avenue, 27th Floor
New York, NY 10022
(212) 319-7125

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AFFIDAVIT OF SCOTT D. MICHEL, ESQ.
SEEKING ADMISSION PRO HAC VICE

SCOTT D. MICHEL, being duly sworn, deposes and says:

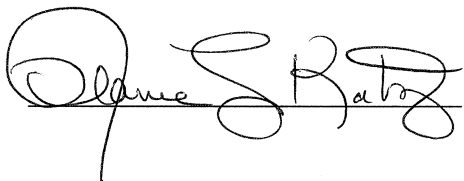
1. I am a member of the firm of Caplin & Drysdale, Chartered, One Thomas Circle, NW, Washington, D.C. 20005.
2. I make this Affidavit in accordance with local rule 1.3(c) of the Local Rules of the United States District Court for the Southern and Eastern Districts of New York in support of my application for admission pro hac vice.
3. I received my B.S. degree from Northwestern University in 1977 and a Juris Doctorate from the University of Virginia School of Law in 1980. I am a member in good standing of the Bar of the State of New York, admitted to practice before all state courts in New York since 1993. Annexed to this affidavit is a certificate of good standing issued by the Clerk of the Appellate Division of the Supreme Court of New York, Third Judicial Department.
4. I have never been held in contempt of court, censured, suspended or disbarred by any court. No disciplinary matters are now pending against me.
5. Walter Nagel has requested that Caplin & Drysdale, Chartered represent him in this action, with me serving as his principal counsel.

6. I am familiar with the provisions of Judicial Code (Title 28 U.S.C.) pertaining to the jurisdiction of and practice in the United States District Court, the Federal Rules of Civil Procedure and Evidence, and the Code of Professional Responsibility of the American Bar Association. I have reviewed a copy of the Local Civil Rules of the United States District Court for the Southern District of New York, and undertake to abide by them.



SCOTT D. MICHEL

Sworn to before me this ^{21ST}20th day of December, 2004



JEANNE G. KATZ
Notary Public of District of Columbia
My Commission Expires December 14, 2007



State of New York
Supreme Court, Appellate Division
Third Judicial Department

I, Michael J. Novack, Clerk of the Appellate Division of the Supreme Court of the State of New York, Third Judicial Department, do hereby certify that

Scott D. Michel

having taken and subscribed the Constitutional Oath of Office as prescribed by law, was duly licensed and admitted to practice by this Court as an Attorney and Counselor at Law in all courts of the State of New York on the 5th day of October, 1993, is currently in good standing and is registered with the Administrative Office of the Courts as required by section four hundred sixty-eight-a of the Judiciary Law.

In Witness Whereof, I have hereunto set my hand and affixed the Seal of said Court, at the City of Albany, this 14th day of December, 2004.



Michael J. Novack

Clerk

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**ORDER GRANTING MOTION FOR
ADMISSION OF
SCOTT D. MICHEL PRO HAC VICE**

ELIHU INSELBUCH, a member in good standing of the Bar of this Court, having moved for the admission of Scott D. Michel, Esq., for admission *pro hac vice*, to argue and try this action in whole or in part, and the Court having read and filed the Affidavit of Scott D. Michel, Esq., sworn to on December 20, 2004, and there being no objections and after due deliberation, it is hereby

ORDERED, that Scott D. Michel, Esq., be admitted to the Bar of this Court *pro hac vice* to argue and try this action in whole or in part on behalf of defendant on the Counterclaim Walter Nagel.

Dated: New York, New York
December __, 2004

Honorable Denise L. Cote
United States District Judge

